

### REMARKS

Claims 1-5, 11-17, and 22-25 are pending in the present application. Claims 6-10 and 18-21 are canceled. Claims 1, 2, 14, and 25 are amended to incorporate features previously presented in claims 6-10 and 18-21. Support for the claimed "clarification control" may be found in the present specification in Figure 4A, element 416; Figure 4B, element 466; and page 12, line 1, to page 13, line 12. Reconsideration of the claims is respectfully requested.

#### **I. Drawings**

The Office Action states that new corrected drawings are required as specified in the attached form PTO-948, which notes that the drawings filed on January 8, 2002, are objected to. However, formal drawings were filed on March 18, 2002. Please find attached a copy of the postcard indicating receipt of the formal drawings by the Office. Applicants respectfully request consideration of the later filed drawings. If necessary, Applicants will send another copy of the drawings for consideration by the draftsman.

#### **II. 35 U.S.C. § 103, Obviousness**

The Office Action rejects claims 1-23 and 25 under 35 U.S.C. § 103 as being unpatentable over the Applicants' alleged admission of prior art in view of Internet Explorer, version 5, released 1998. This rejection is respectfully traversed.

Applicants concede that Web pages that include background images, background colors, and text colors existed prior to the present invention. However, Applicants do not concede that recognition of the problem associated with background images, background colors, and text colors existed in the prior art or, if so, that the problem was solved in a manner equivalent to the present invention.

Internet Explorer version 5.0, hereinafter referred to as "IE 5.0," appears to include options to configure default settings for ignoring colors, font styles, and font sizes specified on Web pages. As illustrated in the Office Action, IE 5.0 also appears to include options to configure default settings for text color, background colors, and link colors. These settings are always applied to Web pages when IE 5.0 displays the Web pages.

In contradistinction, the present invention provides a method, apparatus, and computer program product for clarifying a document in response to activation of a clarification control. A document is retrieved and presented and, in response to activation of a clarification control, the presently claimed invention modifies an attribute of a component of the Web page to clarify display of the document based on a set of user preferences. Therefore, a user may turn clarification on and off depending upon the document being presented. The user preferences are applied to the document in response to a user activating a clarification tool or control, rather than applying preferences for all documents.

Neither the allegedly admitted prior art nor IE 5.0 teaches or suggests modifying an attribute of a component of a document to clarify display of the document based on a set of user preferences to form a clarified document in response to activation of a clarification control, as recited in claim 1. With respect to similar features previously presented in claims 6 and 18, for example, the Office Action alleges that Applicants' allegedly admitted prior art and IE 5.0 teach this feature. However, the Office Action merely concludes that the feature is taught without citing a single portion of any reference for support. As stated above, the settings and preferences of IE 5.0 are applied to every document all the time. Thus, IE 5.0 simply does not teach the feature and the Office Action fails to establish a *prima facie* case of obviousness.

Applicants' allegedly admitted prior art and IE 5.0, taken alone or in combination, fail to teach or suggest each and every claim limitation. Therefore, Applicants' allegedly admitted prior art and IE 5.0 do not render at least claim 1 obvious. Independent claims 14, 24, and 25 recite subject matter addressed above with respect to claim 1 and are allowable for at least the same reasons. Since claims 2-5, 11-13, 15-17, 22, and 23 depend from claims 1 and 14, the same distinctions between Applicants' allegedly admitted prior art and IE 5.0 and the invention recited in claims 1 and 14 apply for these claims. Additionally, claims 2-5, 11-13, 15-17, 22, and 23 recite other additional combinations of features not suggested by the reference.

More particularly, with respect to claims 11 and 22, the Office Action alleges that Applicants' allegedly admitted prior art and IE 5.0 disclose a step of authenticating a user, wherein the step of modifying the attribute is performed in response to the user

being authenticated. While the cited portion of IE 5.0 does teach configuring settings for user authentication, there is no teaching of **modifying** an attribute of a component of a document to form a clarified document **in response to** the user authentication. Therefore, Applicants' allegedly admitted prior art and IE 5.0, taken individually or in combination, fail to teach or suggest each and every limitation of claims 11 and 22.

Neither Applicants' allegedly admitted prior art nor IE 5.0 teaches or suggests creating an intermediate modified document, as recited in claims 12, 13, and 23. The Office Action alleges that Applicants' allegedly admitted prior art and IE 5.0 teach this feature. However, the Office Action merely concludes that the feature is taught without citing a single portion of any reference for support. There is no teaching whatsoever of creating an intermediate document. Thus, IE 5.0 simply does not teach the feature and the Office Action fails to establish a *prima facie* case of obviousness for claims 12, 13, and 23.

With respect to claim 24, the Office Action argues that the Tools menu of IE 5.0 is a selectable clarification tool that causes the controller to modify attributes of the document to form a modified document when selected. Applicants respectfully disagree. Selection of the Tools → Internet Options → Accessibility activates a configuration dialog that allows a user to change preferences. However, the settings are always applied to documents at the time the documents are displayed. In other words, when a document is retrieved for display, the current settings, whatever they may be, are applied to the retrieved document. Application of preferences or settings is not selectable in IE 5.0. Therefore, Applicants' allegedly admitted prior art and IE 5.0, taken alone or in combination, fail to teach or suggest each and every limitation of claim 24. For the above reasons, the applied references do not render claim 24 obvious.

Therefore, Applicants respectfully request withdrawal of the rejection of claim 24 under 35 U.S.C. § 103.

III. Conclusion

It is respectfully urged that the subject application is patentable over the prior art of record and is now in condition for allowance.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE:

August 26, 2004

Respectfully submitted,



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